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May 6, 2019

**VIA ECF**

Hon. Joseph A. Dickson, U.S.M.J.  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Court Room MLK 2D  
Newark, NJ 07101

Re: Dorsainvil v. Peim, et al.  
Case No. 2:15-cv-3035-ES-JAD

Dear Judge Dickson:

We represent Defendants, Carol Gallagher (“Gallagher”) and Alejandrina R. Sumicad (“Dr. Sumicad”) (jointly “Defendants”), in the above-referenced matter. Per the Court’s Letter Order dated April 2, 2019, the parties are to respond to discovery requests by May 2, 2019. See Docket Entry No. 46. Plaintiff, however, has not yet filed his Second Amended Complaint which he was ordered to file by May 3, 2019 per the Court’s Letter Order dated April 1, 2019. See Docket Entry No. 45. Accordingly, Defendants seek an extension to respond to discovery until two weeks after we receive the Second Amended Complaint. An extension is sought to allow Defendants time to review the complaint and finalize their discovery responses based upon the allegations set forth against them. Defendants further note that they have not filed an answer in this matter since their motions to dismiss were denied as moot when the court granted Plaintiff leave to file a Second Amended Complaint. If the court is not inclined to grant Defendants’ request, Defendants request a two week extension, until May 24, 2019, to respond.

Thank you Your Honor for your attention to the above.

Respectfully submitted,

*s/Margaret Raymond-Flood*

Margaret Raymond-Flood

MRF/chr

cc: Wedpens Dorsainvil, pro se (via Regular Mail)

